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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

GEORGE JARAMILLO, II, an Individual

|Case No.: 2:21-cv-00891-RFB-BNW

Plaintiff,

VS.

AREA 15 LAS VEGAS LLC, a Delaware Limited Liability Company, AREA 15 GLOBAL LLC, a Delaware Limited Liability Company, ARNOLD FISHER, an Individual, KENNETH FISHER, an Individual, STEVEN FISHER, an Individual, WINSTON FISHER, an Individual, FISHER BROTHERS MANAGEMENT CO. LLC, a New York Limited Liability Company, FISHER BROTHERS FINANCIAL AND DEVELOPMENT COMPANY LLC, a New York Limited Liability Company, and DOES 1-50 Inclusive,

Defendants.

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO DEFENDANTS' MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION [ECF NO. 21] AND
MOTION TO DISMISS FOR FAILURE
TO STATE A CLAIM [ECF NO. 22]**

(FIRST REQUEST)

Plaintiff GEORGE JARAMILLO, II (“*Plaintiff*”), by and through his undersigned counsel of record, the law firms of Brown, Clark, Le, Ames, Stedman & Cevallos LLP and Kaplan Cottner, and Defendants AREA 15 LAS VEGAS LLC, AREA 15 GLOBAL LLC, ARNOLD FISHER (“*Arnold*”).

KENNETH FISHER (“Kenneth”), STEVEN FISHER (“Steven”), WINSTON FISHER (“Winston,”) and together with Arnold, Kenneth, and Steven, the “*Fisher Individuals*”), FISHER BROTHERS MANAGEMENT CO. LLC, and FISHER BROTHERS FINANCIAL AND DEVELOPMENT COMPANY LLC (collectively, “*Defendants*”), by and through their undersigned counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate to an extension of time for Plaintiff to Respond to Defendants’ Motion to Dismiss Complaint under FRCP 12(b)(2) for Lack of Personal Jurisdiction [ECF No. 21] and Defendants’ Motion to Dismiss Complaint under FRCP 12(b)(6) for Failure to State a Claim [ECF No. 22] (collectively, the “Motions to Dismiss”), as set forth below:

1. On May 6, 2021, Plaintiff filed his Complaint in this Court against Defendants. *See generally* ECF No. 1.

2. On August 2, 2021, Arnold, Kenneth, and Steven (and the Fisher company Defendants), filed a Motion to Dismiss for Lack of Personal Jurisdiction Under FRCP 12(b)(2). *See* ECF No. 21.

3. On August 2, 2021, all Defendants also filed a Motion to Dismiss for Failure to State a Claim Under FRCP 12(b)(6). *See* ECF No. 22.

4. This Court may extend the deadline to respond to the Motions to Dismiss for good cause. *See* FRCP 6(b)(1).

5. There is good cause to grant an extension of 30 days’ time to respond to the Motions to Dismiss.

6. The parties previously entered into multiple stipulations for extensions of time for all Defendants to respond to the Complaint by August 2, 2021. *See* ECF Nos. 12-14.

7. On August 2, 2021, Defendants filed 2 substantive Motions to Dismiss. *See* ECF No. 21-22.

8. Plaintiff seeks additional time to evaluate and analyze the arguments made in the Motions to Dismiss to determine, among other things, whether it is necessary to amend the Complaint or voluntarily dismiss any of Plaintiff’s claims.

1 9. Due to Plaintiff's counsel's respective calendars and need to confer on the issues, they
2 are unable to fully evaluate and analyze Defendants' arguments and confer on the issues raised by
3 Defendants' Motions to Dismiss.

4 10. The instant request is timely, as the deadline for Plaintiff to respond to the Motions to
5 Dismiss is August 16, 2021. *See* FRCP 6(b)(1)(B) (only requiring an analysis of excusable neglect
6 where extension sought after expiration of the deadline); LR IA 6-1(a) (same).

7 11. This is Plaintiff's first request for an extension of time to respond to the Motion to
8 Dismiss.

9 12. The parties make the instant request in good faith and without any intent to delay these
10 proceedings.

11 Based on the foregoing, Plaintiff and Defendants stipulate to a 30-day extension of time for
12 Defendants to respond to the Motions to Dismiss, through and including September 15, 2021.

13 DATED 11th day of August, 2021.

14 KAPLAN COTTNER

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RICHARD F. BOULWARE, II
37 United States District Court

38 DATED this 12th day of August, 2021.